

## **Kent County Compliance Review November, 2006**

At its May 2005 meeting, the Michigan Emergency Telephone Service Committee's (ETSC) Certification Subcommittee voted to perform a *for cause* compliance review of Kent County 9-1-1. For cause reviews may be initiated based on reasonable suspicion of questionable practices. Reasonable suspicion is defined as objective and specific facts that are capable of being articulated. Compliance reviews are performed for the expenditures of funds generated through the provisions of the amended 9-1-1 Act, PA 32 of 1986 (the act). This includes: wireless revenues distributed to counties through the State; revenues collected through county 9-1-1 operational surcharges on landline phones; and dispatcher training funds distributed to primary public safety answering points (PSAPs).

Certification Subcommittee Chair William Charon named himself and subcommittee members Gribler, Hensel, Miller-Brown, Fyvie, and Nystrom to the Kent County Compliance Review Team. The years 2002, 2003, and 2004, and 2005 (to date) were determined as the time period for the review.

### **Background:**

Kent County does not collect county 9-1-1 operational surcharge on landline phones. However, it does receive quarterly wireless 9-1-1 distributions under the act and all six of the public safety answering points (PSAPs) in the county receives dispatcher training funds. The review encompassed those funds and this report contains a separate review section for each PSAP and Kent County's administration of the wireless 9-1-1 funds.

Kent County has five landline PSAPs: Kent County Sheriff Dept, Grand Rapids Police Dept, Grandville Police Dept, Wyoming Police Dept, and Walker Police Dept. Additionally, there are two wireless PSAPs in Kent County; Grand Rapids Police Department processes the calls from designated towers serving the city limits, and the Michigan State Police Rockford Post processes all others.

### **Circumstances of the review:**

In March of 2005 State 9-1-1 Coordinator Miller-Brown was contacted by two parties involved in the deployment of Phase I wireless 9-1-1 service making inquiries about delays they had experienced with Grand Rapids Police Department (GRPD). Miller-Brown advised the chairs of the ETSC and the Certification Subcommittee.

Further inquiries into the Phase I status of the two wireless PSAPs in Kent County revealed that several providers (Nextel and Verizon) had not been deployed by GRPD as previously indicated in the reporting processes. The 2004 reporting of both wireless PSAPs in Kent County reported Verizon as Phase I deployed. However, all the Verizon Wireless 9-1-1 calls in the county were being routed to the State Police Rockford Post (MSPR).

Additionally, GRPD had reported its deployments as "a work in progress" for the 2004 Certification process and Nextel as Phase 1 "implemented". MSPR reported that Nextel had not deployed Phase I in Kent County for the 2004 reporting. A preliminary review team verified that Nextel was not Phase I deployed in Kent County. The appropriate parties were briefed by the state 9-1-1 administrator and the matter presented to the Certification Subcommittee at its May 3<sup>rd</sup> and May 24<sup>th</sup>, 2005 meetings. As a result of the inconsistent information the subcommittee determined that Kent County would be subject to a *for cause* compliance review.

## **Kent County Fund Administration and Training Distribution Review Process:**

On July 19<sup>th</sup>, 2005 the following information was requested from Kent County:

- Documentation supporting the 5% administrative charges to Kent County's wireless 9-1-1 CMRS receipts for the each of the years 2002, 2003, 2004 and to date 2005.
- Documentation indicating the journal entries with the dates and amounts of wireless 9-1-1 funds issued to Grand Rapids Police Department and the Michigan State Police Rockford Post for wireless 9-1-1 call processing for the years 2002, 2003, 2004, and 2005 to date.
- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the Kent County Sheriff's Dept from 2002 to date.
- Name of a contact person to serve as a coordinator for this review
- A full copy of the current Kent County Final 9-1-1 Plan.

The requested information was received by the State 9-1-1 Administrator's Office in an organized manner. Upon a review of the Kent County documentation, further information was requested as there was a question by the compliance review team about county 5% administrative fee retained by the county for the distribution of wireless -1-1 funds. The county was asked to provide the documentation of the actual costs that justified the 5% administrative fee (\$91,883 had been retained by the county between 2002 and 2005).

Additionally, the compliance review team requested further information in regard to the timeliness of the county's release of wireless funds to its two wireless PSAPs as the records indicated delays in the wireless PSAPs' receipt of those funds from the county, some in excess 100 days after the county received them.

The relevant excerpted response from the county states:

Actual costs incurred by Kent County to provide for this receipt and disbursement of quarterly 911 funded distributions may be consider[ed] nominal in nature including a relatively small amount of time required to identify receipt of wire transferred funds, prepare the required disbursement voucher, print/mail checks and prepare correspondence to recipients . . . . [I]t can readily be acknowledged that the cost incurred by the County does not approach the sums identified for retention . . . .

. . . .

Period delays, in distribution of available proceeds, were caused by either failure by the bank to notify the County of receipt of the wire transfer and/or county staff oversight in addressing the distribution requirement.

Meeting with members of the Kent County Review Team, Captain Larry French, Finance Director Robert White, Commissioner Dan Koorndyk, and a county accountant in Grand Rapids on January 18th, 2006:

The review team discussed the practice of withholding 5% of wireless funds. The act permits reasonable and necessary cost, the team questioned the actual costs of the administration . The fiscal director stated that he could calculate the actual expenses and the remainder would then be distributed to the two wireless PSAPs serving the county. The members of the county present also agreed that they would put systems in place to minimize the time lapse between receipt and distribution. (The State 9-1-1 Administrator's Office has also initiated the practice of advising county 911 coordinators via e-mail of the quarterly distributions).

Subsequent action to the January 18<sup>th</sup>, 2006 meeting:

On January 24<sup>th</sup>, 2006 Fiscal Services Director, Robert White provide the review team with a calculation of actual costs for the administration of the wireless funds. Actual administrative costs from July 2002 through October 2005 totaled \$1,778.24.

On March 21, 2006 the ETSC issued a resolution directing Kent County to only withhold its actual administrative costs and not a general 5% administrative fee from the wireless receipts. The ETSC also directed Kent County to distribute the previously retained 5% administrative fee, less the actual administrative costs, to the wireless PSAPs according to formula set forth in the 9-1-1 plan. A letter reflecting the action was sent to Kent County on March, 22, 2006. In May of 2006 the funds totaling \$90,105 were received by GRPD (\$31,032) and the Michigan State Police Rockford Post (\$59,073).

**Kent County Wireless Funds Summary:**

Wireless 9-1-1 Funds

Wireless 9-1-1 Payments 2002 = 122,755  
Retained as admin fee = 6,137  
Wireless 9-1-1 Payments 2003 = 350,308  
Retained as admin fee = 27,018  
Wireless 9-1-1 Payments 2004 = 563,698  
Retained as admin fee = 28,185  
Wireless 9-1-1 Payments 2005 = 610,865  
Retained as admin fee = 30,543

2006 Administrative Fee Adjustment:

To GRPD: \$31,032  
To MSP Rockford: \$59,073  
Actual County Costs: \$1,778

Training Funds

All wireless training funds are receipted and maintained in a separate account (# 101-346-540). Kent County Sheriff Dept (KCSD) received training distributions from 2001 through 2005. Initial information received by the compliance review team in September 2005 indicated that KCSD still had training distributions from 2002 and 2003 that had not yet been spent down in accordance with the two-year plus year of receipt spend-down time limit established by the ETSC. In October 2005 letter was sent to KCSD advising the department that \$19,578 would need to be spent down in order to qualify for 2006 distributions.

At the time of 2006 training fund application period was completed, the KCSD had not met the required spend-down of its 2003 funds, making KCSD ineligible for 2006 training fund distribution. (The figures below are through the calendar year ending December 31, 2005).

Training Fund Distribution 2001 = 6,034  
Training Fund Distribution 2002 = 10,632  
Training Fund Distribution 2003 = 17,309  
Training Fund Distribution 2004 = 8,856  
Training Fund Distribution 2005 = 14,337

Training Fund Expenditures 2001 = -0-  
Training Fund Expenditures 2002 = -0-  
Training Fund Expenditures 2003 = 2,825  
Training Fund Expenditures 2004 = 6,645  
Training Fund Expenditures 2005 = 4,086

### **Kent County Final Findings and Summary:**

The Kent County 9-1-1 Plan is current and is in compliance with P.A. 32. However, as PSAPs discuss combined operations and other modifications are made to the 9-1-1 system, the county should remain cognizant of changes in the plan that may be necessary. Additionally, the plan should be amended as soon as practicable to reflect the practice of retaining actual costs for fund administration.

#### *Necessary Corrective Action (completed):*

The county has taken steps to discontinue the practice of a flat retention of 5% administrative fee and the County Treasurer's Office made the requisite internal changes promptly re-distribute the funds to its wireless PSAPs.

In closing, based upon the documentation requested, made available to, and reviewed by the committee, Kent County is in compliance with the requirements of PA 32, as amended.

### **Grand Rapids Police Department Review Process:**

On July 18<sup>th</sup>, 2005 the following information was requested from Grand Rapids Police Department (GRPD):

- Documentation indicating the journal entries with the dates and amounts of wireless 9-1-1 funds received by Grand Rapids Police Department from Kent County for wireless 9-1-1 call processing for the years 2002, 2003, 2004, and 2005 to date.
- Copies of budgetary expenditures for wireless 9-1-1 funds receipts for 2002, 2003, and 2004.
- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the GRPD from 2002 to date.
- Name of a contact person to serve as a coordinator for this review

The requested information was received by the State 9-1-1 Administrator's Office. Both the wireless distributions from Kent County and the dispatcher training distributions were accounted for in GRPD Index 1730Commun with accounting codes for each fund (wireless from Kent County was object code 676017 and corrected to object code 580002 in 2003). The GRPD accounting documents indicated delayed distributions from the county, that issue has been addressed as indicated under *Necessary Corrective Action* noted above.

### **Wireless Deployment:**

Carriers verified Phase I deployment complete for Kent County by June 30<sup>th</sup>, 2005 with Nextel and Verizon routing all calls to the Michigan State Rockford Post (MSPR) until tower routing for the GRPD PSAP could be completed. Direct Phase II routing to GRPD was completed for Nextel September 2005 and for Verizon in November 2005. In December of 2005 the GRPD PASP was Phase I and II compliant, with several providers scheduled to deploy Phase II later in 2006 as a result of permitted consent extensions.

Meeting on January 25, 2006 with Dale Gribler, Charles Nystrom, Harriet Miller-Brown, GRPD Capt. Kevin Belk, and GRPD PSAP Manager, Ralph Gould:

With Phase I completed for GRPD, Mr. Gould demonstrated that the Phase II deployments at GRPD were being tracked and tested for all carriers. The city had recently approved a contract with Northrup-Grumman for mapping. Until that time the PSAP was using an internet-based service for its latitude and longitude-to-location conversion for Phase II calls. GRPD had given Cingular a consent extension due to its acquisition of AT&T's network (this was done in several Michigan counties including Wayne and Oakland).

The mapping, CPE, and CAD were demonstrated for the review along with a tour of the communications center and the equipment room. GRPD provides dispatching services for police and fire/rescue. EMS calls are transferred to a secondary PSAP for dispatching and pre-arrivals. There is documented training program for new dispatchers. Additionally, GRPD has operational policies and procedures in place and accessible to the dispatchers.

### **Wireless Funds:**

The wireless funds received through the Kent County are used towards the operating expenses of the GRPD PSAP operational expenses. Approximately 28% of the 9-1-1 calls received by GRPD are wireless calls (the CPE is currently unable to track the calls separately). The wireless distribution comprises approximately 7% of the GRPD PSAP budget.

#### Wireless 9-1-1 Distributions

Wireless 9-1-1 Payments 2002 = 194,957  
Wireless 9-1-1 Payments 2003 = 173,003  
Wireless 9-1-1 Payments 2004 = 184,430  
Wireless 9-1-1 Payments 2005 (to Sept. 2005) = 95,201

#### PSAP Expenditures

Annual Operating Expenditures 2002 = 3,026,132  
Annual Operating Expenditures 2003 = 2,917,768  
Annual Operating Expenditures 2004 = 2,885,334  
Annual Operating Expenditures to Sept. 2005\* = 291,599  
\* does not include wages

#### Training Funds

All wireless training funds are receipted and maintained in a separate accounting index 1730COMMUN, object code 574011.

The 2003 training distributions have been used in full in accordance with the two-year time limit established by the ETSC, making GRPDD eligible for 2006 application. [At the time of this final report](#), GRPD had applied for training funds, receiving distributions for 39 FTEs. (The figures below are through the calendar year ending December 31, 2005).

Training Fund Distribution 2001 = -0-  
Training Fund Distribution 2002 = -0-  
Training Fund Distribution 2003 = 19,385  
Training Fund Distribution 2004 = -0-  
Training Fund Distribution 2005 = -0-

Training Fund Expenditures 2002 = -0-  
Training Fund Expenditures 2003 = 499  
Training Fund Expenditures 2004 = 1,084  
Training Fund Expenditures 2005 = 17,857

### **GRPD Findings and Final Summary:**

While there was initially a delayed Phase I implementation for several CMRS providers, the GRPD acted in concert with those providers to deploy Phase I. GRPD is currently compliant in its Phase II deployment, including its on-site equipment and ongoing work with providers.

## **Michigan State Police Rockford Post Review Process:**

On July 19<sup>th</sup>, 2005 the following information was requested from the Michigan State Police Rockford Post (MSPR):

- Documentation indicating the journal entries with the dates and amounts of wireless 9-1-1 funds received by Michigan State Police Rockford Post from Kent County for wireless 9-1-1 call processing for the years 2002, 2003, 2004, and 2005 to date.
- Copies of budgetary expenditures for wireless 9-1-1 funds receipts for 2002, 2003, and 2004.
- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the MSPR from 2002 to date.
- Name of a contact person to serve as a coordinator for this review.

The requested information was received by the State 9-1-1 Administrator's Office in a timely and organized manner.

### **Wireless Deployment:**

In December of 2005 the GRPD PASP was Phase I and II compliant, with several providers scheduled to deploy Phase later in 2006 as a result of consent permitted consent extensions.

Meeting on January 25, 2006 with Dale Gribler, Charles Nystrom, Harriet Miller-Brown, Rockford MSP Post Commander F/Lt. Steven Harper and MSPR CAD Administrator Harvey Becker:

The CAD, CPE, and mapping were demonstrated for the review team. The primary role of MSPR is to answer wireless calls, screen calls for incidents with a high level of multiple callers (i.e. accidents on expressways), convert calls to location if necessary and transfer then to the appropriate PSAP for dispatching. EMS calls are transferred to a secondary PSAP for dispatching and pre-arrivals. The team reviewed on-site documentation for training and policy procedures.

### **Wireless Funds:**

The wireless distributions from Kent County were accounted for in MSPR Index CD # 32600 / PCA 31825. MSPR accounting documents indicated delayed distributions from the county, that issue has been addressed as indicated under *Necessary Corrective Action* noted in the Kent section above.

The wireless funds received through Kent County are used towards the specific operating expenses related wireless 9-1-1 call taking functions. All 9-1-1 calls received by GRPD are wireless calls. The remaining wireless distributions have been set in a separate fund and were transferred into MSPR dispatch operations for FY06 and FY07. (Attached memo dated September 20, 2006 from MSP Communications Section Manager, Ms. Pamela Matelski).

### **Wireless 9-1-1 Distributions**

Wireless 9-1-1 Payments 2002 = 294,666  
Wireless 9-1-1 Payments 2003 = 316,495  
Wireless 9-1-1 Payments 2004 = 347,336  
Wireless 9-1-1 Payments 2005 (to Sept. 2005) = 275,216

### **Specific Allowable PSAP Expenditures**

Allowable Expenditures 2002 = 65,219  
Allowable Expenditures 2003 = 58,147  
Allowable Expenditures 2004 = 370,266  
Allowable Expenditures to Sept. 2005 = 95,434

### Training Funds:

All wireless training funds are receipted and maintained in a separate accounting in MSPR Fund # 3297 under PCA 31825. The training distributions from 2001 through 2005 have been used in full in accordance with the two-year time limit established by the ETSC, making MSPR eligible for 2006 application. **At the time of this final report**, MSPR had applied for 2006 training funds, receiving distributions for 9 FTEs. (The figures below are through the calendar year ending December 31, 2005).

Training Fund Distribution 2001 = 2,553

Training Fund Distribution 2002 = 3,828

Training Fund Distribution 2003 = 6,923

Training Fund Distribution 2004 = 3,080

Training Fund Distribution 2005 = -0-

Training Fund Expenditures 2002 = 2,093

Training Fund Expenditures 2003 = -0-

Training Fund Expenditures 2004 = 9,409

Training Fund Expenditures 2005 = 4,291

### **MSPR Findings and Final Summary:**

While the system was designed with forethought and coordination to best use wireless resources, the MSPR PSAP the review team made several observations for improved PSAP operations.

#### *Recommendations:*

- 1) Dispatchers are sent to ongoing training on a regular basis. However, the current training program of new dispatchers is done through the “shadowing” of experienced dispatchers. In addition to the shadowing, a written training program that documents dispatcher tasks and progress should be developed and implemented.
- 2) Additional written policies and procedures specific to the wireless 9-1-1 services of MSPR should be developed. While the dispatchers perform the call answering tasks very well, several basic practices specific to wireless are not routinely used. This includes the testing the Phase II system by performing re-bids as time and circumstances allow. Additionally, “blind transfers” are often done, this method of call transfer is considered to be a disfavored practice within the 9-1-1 community. (The transfer of a 9-1-1 without some type of an announcement from the transferor).

### **Wyoming Police Department Training Funds Review Process:**

On July 19<sup>th</sup>, 2005 the following information was requested from the Wyoming Police Department (WYPD):

- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the WYPD from 2002 to date.
- Name of a contact person to serve as a coordinator for this review.

On January 18<sup>th</sup>, 2006 Kent County compliance review team members Fyvie, Nystrom, and Miller-Brown visited the Wyoming Police Department and observed its operation. All wireless training funds are receipted and maintained in accounting fund # 101-305-32101-860.000.

The training fund application records on file with the ETSC indicate that WYPD had received training funds for 2003 and 2004. An initial review of WYPD’s spend down for funds through 2003 indicated that WYPD would need to spend down at least \$6,562 by December 31<sup>st</sup>, 2005 to qualify for 2006 training fund distribution. In October 2005 a letter was sent to WYPD advising of the needed spend down for 2006 eligibility.

At the time this report was completed, the 2003 funds had met the required spend-down, making Wyoming PD eligible for 2006 training fund distribution for 10 FTEs. (The figures below are through the calendar year ending December 31, 2005).

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Training Fund Distribution 2001 = -0-  
Training Fund Distribution 2002 = -0-  
Training Fund Distribution 2003 = 11,769  
Training Fund Distribution 2004 = 3,850  
Training Fund Distribution 2005 = -0-

Training Fund Expenditures 2001 = -0-  
Training Fund Expenditures 2002 = -0-  
Training Fund Expenditures 2003 = 1,769  
Training Fund Expenditures 2004 = 9,050  
Training Fund Expenditures 2005 = 1,044

### **Grandville Police Department Training Funds Review Process:**

On July 19<sup>th</sup>, 2005 the following information was requested from the Grandville Police Department (GVPD):

- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the GVPD from 2002 to date.
- Name of a contact person to serve as a coordinator for this review.

On January 18th, 2006 Kent County compliance review team members Fyvie, Nystrom, and Miller-Brown visited the Grandville Police Department and observed its operation. All wireless training funds are receipted and maintained in a separate account #101-315-874001.

The training fund application records on file with the ETSC indicate that GVPD received training funds for 2003 through 2005. An initial review of GVPD's spend down for funds received through 2003 indicated that GVPD would need to spend down at least \$1,004 by December 31<sup>st</sup>, 2005 to qualify for 2006 training fund distribution. In October 2005 a letter was sent to GVPD advising of the needed spend down for 2006 eligibility.

At the time this report was completed, the 2003 funds had not met the required spend-down, making GVPD ineligible for 2006 training fund distribution. (The figures below are through the calendar year ending December 31, 2005).

Training Fund Distribution 2001 = -0-  
Training Fund Distribution 2002 = -0-  
Training Fund Distribution 2003 = 2,770  
Training Fund Distribution 2004 = 1,925  
Training Fund Distribution 2005 = 2,867

Training Fund Expenditures 2001 = -0-  
Training Fund Expenditures 2002 = -0-  
Training Fund Expenditures 2003 = 944  
Training Fund Expenditures 2004 = 867  
Training Fund Expenditures 2005 = 505



### **Walker Police Department Training Funds Review Process:**

On July 18<sup>th</sup>, 2005 the following information was requested from the Walker Police Department (WKPD):

- Copies of wireless training funds, revenue journal entries and expenditures, and completed ETSC-510 forms for the wireless training fund received by the WKPD from 2002 to date.
- Name of a contact person to serve as a coordinator for this review.

On January 18th, 2006 Kent County compliance review team members Fyvie, Nystrom, and Miller-Brown visited the Walker Police Department and observed its operation. All wireless training funds are receipted and maintained in account # 265-000-009-000.

The training fund application records on file with the ETSC indicate that WKPD received training funds for 2001 through 2004. An initial review of WKPD's spend down for funds received through 2003 indicated that WKPD would need to spend down at least \$4,485 by December 31<sup>st</sup>, 2005 to qualify for 2006 training fund distribution. In October 2005 a letter was sent to WKPD advising of the needed spend down for 2006 eligibility.

At the time this report was completed, the 2003 funds had not met the required spend-down, making WKPD ineligible for 2006 training fund distribution. (The figures below are through the calendar year ending December 31, 2005).

Training Fund Distribution 2001 = 1,392

Training Fund Distribution 2002 = 2,552

Training Fund Distribution 2003 = 4,154

Training Fund Distribution 2004 = 2,310

Training Fund Distribution 2005 = -0-

Training Fund Expenditures 2001 = -0-

Training Fund Expenditures 2002 = 567

Training Fund Expenditures 2003 = -0-

Training Fund Expenditures 2004 = 1,654

Training Fund Expenditures 2005 = -0-

### **Compliance Review Team Additional Closing Observations:**

In final summary, the overall Kent County 9-1-1 system is a set of six separate 9-1-1 systems, while they each operate to serve the public safety interests of the communities they serve, several observations were made as an overall impression on the review team. 1) While it was evident that the law enforcement community was networked in sharing resources and activity, the dispatch center managers/commanders did not give the impression of having an ongoing network among themselves. 2) With few exceptions the under-use of training dollars available to the PSAPs was evident during the review. While several PSAPs had taken recent action to fully utilize the training funds, several others (as evidenced by the applications for 2006 funds) had not.

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November 2006

